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16 September 1997

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W. Room 222 Washington, DC 20555

Subject: EX PARTE PRESENTATION

CC Docket No. 92-237

Dear Mr. Caton:

On 16 September 1997, representatives of Mitretek Systems met with FCC Commissioner Susan Ness and Mr. James Casserly to discuss the Commission's pending selection of a new North American Numbering Plan Administrator. Mitretek representatives in attendance were Dr. H. Gilbert Miller and David A. Garbin. Mitretek limited its comments to material already publicly available in the above-captioned proceedings.

Innovative Technology in the Public Interest

Two copies of this letter have been submitted to the Secretary of the Commission for inclusion in the public record, as required by Sec. 1.1206(a)(2) of the Commission's rules.

Sincerery

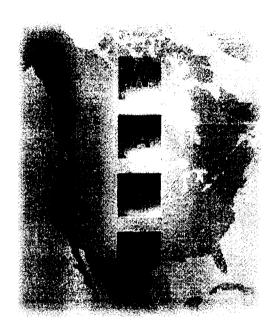
I. Gilbert Miller

cc: Commissioner Ness

HGM/dm

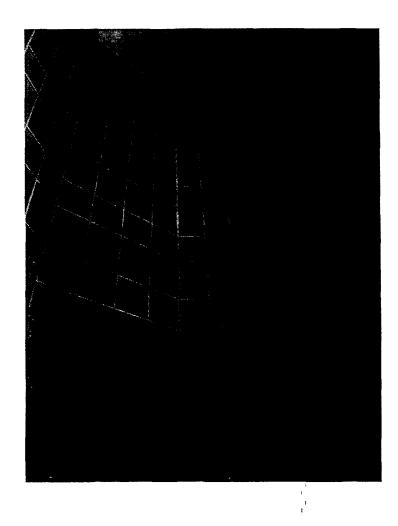
Attachment

No. of Cooles rec'd 64 List AUCINE



North American Numbering Plan Administration

Mitretek Systems



- Non-profit, technology organization
- Chartered to work in the public interest
- No private ownership rights and no stock
- No affiliations, associations, or partnerships with telecommunications providers
- Refrain from commercial activity
- Stringent conflict of interest policies
- Experienced in handling classified and proprietary information
- Performance evaluated against technical quality, utility, and responsiveness metrics



2

The Record Available for the NANPA Selection

- Issues raised in the industry comments
 - Sufficient staff to administer the NANP
 - Proposed number of NANPA activities
 - Price difference, need to examine unit price
 - Mitretek proposal is superior or more realistic
 - Urgency of implementation
 - Neutrality
- NANC and NANPA Working Group Reports
- Proposals
- Previous record
- Federal Numbering Policy



Was a Sufficient Number of Staff Proposed?

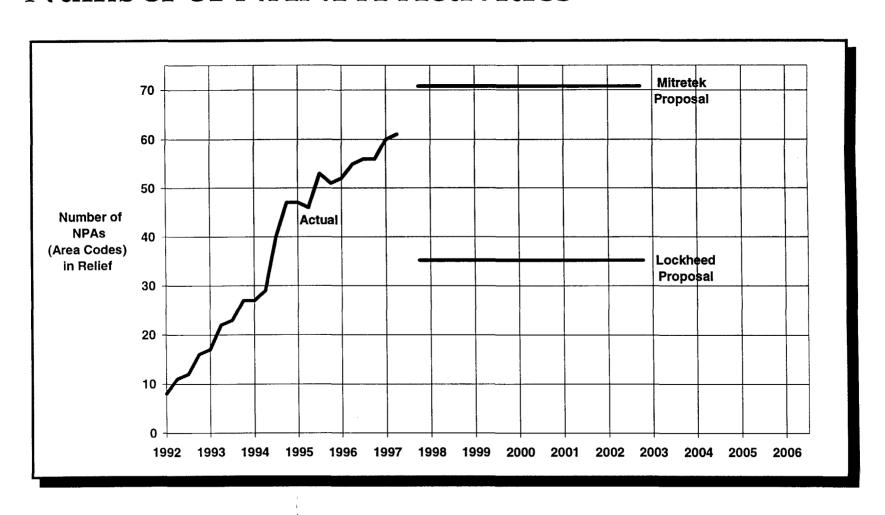
Proposals	Total Staff	CO Code Administration and NPA Relief Planning Functions	Only NPA Relief Planning Functions
Mitretek	53	27 plus 10 support staff	17
Lockheed	25	11	

Benchmarks

FCC	40 to 50		
Incumbents		39 plus 15 support staff	
California PUC			California Only - 9



Proposed Staff Versus Number of NANPA Activities



Why is Neutrality Important?

Telecommunications Industry

- Improved que at received from industry for a entally better NANP
 - Required
 - Strategi
 - Mark
- Reduced is

Fewer disputes

Fewer ations

NANP Administration **CO Code Administration**

Dispute Resolution

resources

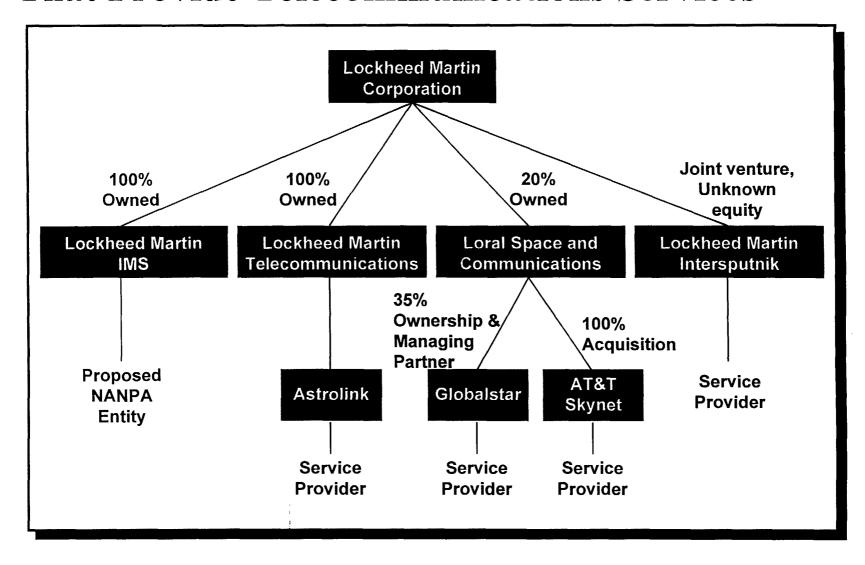
reports

NANC

Enterprise Services

MITRETEIX S Y S T E M S

Lockheed Martin Operating Units and Affiliates That Provide Telecommunications Services



Mitretek Recommendations

Telecommunications Industry

- Support this critical reaking with the proper, appropriate necessary level of staffing, funding er resources
- Ensure that the Administration is able to fulfill bering Policy
 - Efficient une y pa
 - Competitively neutro
 - Technology weutral

NANP Administration CO Code Administration

Dispute Resolution

Enterprise Services





Innovative Technology and NANP Administration in the Public Interest

